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December 20, 2021

VIA ECF:

Honorable Judge Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Watson et al. v. Lexus of Manhattan
Case Nos.: 1:20-cv-04572 (LGS), 1:21-cv-01588(LGS)

Dear Judge Schofield,

The Parties submit this joint letter in accordance with Rule III(A) of Your Honor's Individual Rules and Practices. The parties respectfully request (1) permission to file *Daubert* motions, and (2) an extension of the existing schedule relating to Plaintiffs' Motion for Class Certification.

The parties have completed the supplemental expert discovery previously Ordered by Magistrate Judge on October 19, 2021 (Doc No. 126). The October 19, 2021 Order had set the a briefing schedule in connection with Plaintiffs' anticipated motion for class certification. The parties request the extension of the ordered briefing schedule to permit the parties to file *Daubert* motions in addition to the current schedule conflicting with a medical procedure defendant's counsel is undergoing during that time period.

The parties respectfully request that the motion schedule be set as follows:

Daubert Motion Schedule

- Parties shall file their *Daubert* motions by February 16, 2022;
- Parties shall file their opposition by March 16, 2022, and;
- Parties shall file their reply papers by April 13, 2022.

Class Certification Motion Schedule

- Plaintiffs shall file the motion by February 28, 2022;
- Defendant shall file its opposition by March 28, 2022, and;
- Plaintiffs shall file their reply papers by April 25, 2022.

The parties are available at the Court's convenience to discuss any of the above.

Respectfully submitted,

/s/Jason Myers

Jason Myers, Esq.

Counsel for Defendant

/s/ Daniel Zemel

Daniel Zemel, Esq.

Counsel for Plaintiffs